## REMARKS

Claims 1-35 are all of the pending claims, with claims 1, 14, 19 and 26 being written in independent form.

### I.    Claim Rejections – 35 U.S.C. § 103:

The Examiner rejects claims 1-10, 13-39 under 35 U.S.C. §103(a) as being obvious over US 6,393,506 to Kenny ("Kenny"). The rejection is respectfully traversed.

Although the Examiner agrees that Kenny does not disclose that the pseudo-grant signals begin at the same time as recited in the pending claims, it is alleged that it would have been obvious to one of ordinary skill in the art at the time the invention was made to generate pseudo-grant signals to all requesting masters beginning at the same time.

However, there is no suggestion or motivation to modify Kenny as proposed in the Office Action, nor would such a modification render the pending claims obvious. To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must some suggestion or motivation to modify the reference. Second there must be a reasonable expectation of success. Finally, the prior art reference must teach or suggest all of the claim features. Further, the teaching or suggestion to modify the reference and the reasonable expectation of success must both be found in the prior art and not based on the Applicants disclosure (MPEP §2143).

As admitted in the Office Action, Kenny does not disclose generating a pseudo-grant signal to all requesting master units at the same time. Rather, as shown in Fig. 9A of Kenny, the pseudo-grant signal supplied to the CPU interface control 5, PCI controller 7, and GRPH 8 namely GRANT CHLMA, GRANT CHLMB and GRANT CHLMC are not provided at the same times, namely, T1, T3 and T5 and do not overlap at all. Thus, as shown in Fig. 9A, the arbiter grants virtual channels A, B, and C of descending priority to the CPU interface controller 5, PCI controller 7 and GRPH 8.

As support for the Examiner's allegation that it would have been obvious to modify Kenny to generate a pseudo-grant signal to all requesting master units at the same time, the Examiner points to the disclosure of Kenny that recites "each subsystem that may be configured with a fixed virtual channel with a pre-assigned priority" (see col. 7, lines 5-13). However, merely teaching that each subsystem may be configured with a fixed virtual channel with a pre-assigned priority does not provide motivation or suggestion to modify Kenny to generate pseudo-grant signals to all

requesting master units at the same time. Rather, as indicated in Kenny, pre-designating virtual channels and priorities for each module simplifies processing by eliminating allegation procedures and requiring the arbiter 4 to match the I/O address of the requesting master module to that master module's pre-assigned virtual channel and pre-assigned priority.

Thus, merely granting a pre-assigned priority to master units 1, 7, and 8 with a fixed virtual channel does not correspond to or suggest generating a pseudo-grant signal to all requesting master units at the same time. Instead, pre-assigning the priority merely indicates that when a particular master module asserts an address request or initializes bus access, the master has a pre-assigned priority which the arbiter will read and grant appropriate virtual channel access. Accordingly, the relied upon section of Kenny as providing motivation to modify the applied reference has nothing to do with the generation of a pseudo-grant signal to all requesting master units at the same time.

Further, it is clear from Kenny that the system relies on a hierarchical order of priority, whether that priority is pre-assigned or not. Thus, even were Kenny modified to configure a fixed virtual channel with a pre-assigned priority, the system still would not generate a pseudo-grant to all requesting master units at the same time. Rather, the hierarchical priority system would still be used.

One of ordinary skill in the art at the time of the invention also would not have been motivated to modify Kenny as suggested in the Office Action because there would be no reasonable expectation of success. It is clear from the teachings of Kenny that the priority system is required in all instances and therefore modifying Kenny to generate a pseudo-grant signal to all requesting master units at the same time would likely cause the priority based system to not function for its intended purpose. As a prima *facie case* for obviousness has not been established, withdrawal of the rejections respectfully requested.

## CONCLUSION

In view of the above, Applicant earnestly solicits reconsideration and allowance of all of the pending claims.

Should there be any matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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